#### **Financial Operations Division**

Office of Actuarial and Financial Analytics





# Oregon CCO Billing Guide

Health-Related Social Needs Services

January 2025

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#### **Overview & Purpose**

# HRSN Billing Guide for CCOs

Health-related social needs (HRSN) Services provide housing, nutrition, climate-related supports, and outreach and engagement services to support eligible Members' health and well-being. HRSN Services are covered benefits under the Oregon Health Plan (OHP) and must be provided by Coordinated Care Organizations (CCOs) to eligible Members enrolled in CCO-A or CCO-B who need and want services. The services are foundational to health, intended to improve health outcomes during times of instability and transition, designed to increase health equity, and are assessed based on need. The State received approval from the Centers for Medicare & Medicaid Services (CMS) in September 2022 to provide these services as part of the OHP 2022 – 2027 1115 Medicaid Demonstration Waiver.

HRSN Services are intended to support Members who have unmet health-related social needs with climate-related, housing, and nutrition supports. There are also outreach and engagement (O&E) services to connect Members to these new supports and address other needs they may have. More details on all HRSN Services are included in CCO HRSN Guidance Document, included on the CCO Contract Forms page.

The HRSN billing guide supports CCOs in creating HRSN encounter claims into the Oregon Health Authority for payment through a non-risk contract. Prior to sending in encounters, CCOs are required to have paid the HRSN service provider for the service rendered.

CCOs are responsible for the development and submission of encounters to OHA. HRSN service providers are not required to submit claims directly to OHA or a CCO to perform HRSN services. CCOs may request documentation or invoices to match the billing guide to ensure encounters submitted to OHA meet the following specifications.

### Fee Schedule Overview

A fee schedule is a list of maximum rates to reimburse providers for specific services. The fee schedule outlines what Oregon Health Authority (OHA) will reimburse for each Health Related Social Needs (HRSN) service.

- If an HRSN service provider provides a service to an OHA member enrolled in a Coordinated Care Organization (CCO), the CCO is responsible for reimbursing the provider according to the fee schedule.
- If an HRSN service provider provides a service to an OHA member enrolled in Open Card, they will be paid directly from OHA, in accordance with the fee schedule.

#### **Fee Schedule Development Process**

Development of the fee schedule considered details specific to HRSN services. This included: Service name, Service description, Frequency of service, Duration of service, Setting of service, and Provider type (education, etc.) or Vendor type.

These details are then assessed to determine whether there are already established Medicaid fees, established fees in other State agencies, or if new fee development is required.

#### **Medicaid Fees**

- Already established fees can be leveraged for services already covered elsewhere in Medicaid
- Assessment
  - Compare service descriptions to HRSN services
  - Compare unit definitions
  - Update pricing if needed (e.g., trend)

#### Other State Agencies

- Already established fees can be leveraged for services already offered through other non-Medicaid state programs and agencies
- Assessment
  - Compare service descriptions to HRSN services
  - Compare unit definitions
  - Evaluate pricing differences and adjust if needed

#### New Fee Development

- Develop new rates for services not already offered through the Medicaid program or other State programs and agencies
- Assessment
  - o Incorporate CCO and HRSN service provider input
  - Examine available pricing in State
  - Review other State program fees, if applicable
  - o Ground-up build-up of rates, where needed

#### **HRSN Fee Schedules**

The current HRSN Fee Schedules can be located on the HRSN Service Provider webpage. While combined into one document, there are separate fee schedules for HRSN nutrition, housing, climate, outreach & engagement, and CCO variable admin. Each fee schedule lists a procedure code, modifier, service description, unit, allowable cost or expected cost, and the rate. Rates listed as "Actual cost, subject to maximum allowable" will have an upper payment limit of 150% of the OHA Expected Unit Costs. For example, the upper payment limit for Utilities Set-Up, 0-1 Bedroom, Region A is \$1,419 (\$946\*150%). The HRSN housing fee schedule lists expected unit costs, by region, which were developed to be consistent with the U.S. Department of Housing and Urban Development (HUD) Fair Market Rents (FMR).

# **Billing Codes and Modifiers**

#### **Procedure Code Basics**

- 1. The American Medical Association's (AMA's) Current Procedural Terminology (CPT®) is a uniform coding system consisting of descriptive terms and identifying codes used primarily to identify medical services and procedures furnished by physicians and other health care professionals for which they bill public or private health insurance programs.
- 2. **Healthcare Common Procedure Coding System (HCPCS)** is a set of healthcare procedure codes based on the AMA's CPT.
- 3. HCPCS codes are alpha-numeric and are divided into two primary levels and a third locally used level:
  - Level I: Comprised of CPT® maintained by the AMA.
  - Level II: Centers for Medicare & Medicaid Services maintains HCPCS Level II
    codes, including decisions about additions, revisions, and deletions to the
    codes.
  - Level III: Level III HCPCS codes are used locally. They are a combination of letters and numbers, always starting with the letter X or Z.

Procedure codes and modifiers are used in medical coding to provide additional information about a medical procedure, service, or supply. Although HRSN Services are not medical, procedure codes and modifiers are used to tell the story of the encounter with a member.

#### **Codes Overview for HRSN Services in the State**

- Procedure codes are five characters (typically a letter and four numbers).
   The HRSN procedure codes were selected as they most closely fit with the described HRSN service. For example, for HRSN rent assistance, the procedure code may be H0044 Supported housing, per month.
- Modifiers are two characters (a letter and a number) appended to the procedure code. They provide additional information about the service without changing the meaning of the code. For example, for HRSN rent assistance, the modifiers identify the program (e.g., U1 = HRSN waiver program) and number of bedrooms of the rental unit (e.g., U3 = 2 bedroom).
- All HRSN service claims will have one procedure code and a minimum of one modifier.
  - In most instances, a service will utilize two modifiers.

 For example, for HRSN rent assistance for a two-bedroom unit, the procedure code would be H0044, and the modifiers would be U1 (HRSN waiver program) and U3 (2 bedroom).

# Oregon Health Authority's Process to Determine HRSN Codes

The coding specialists refer to Codify, a subscription-based resource through the American Academy of Professional Coders (AAPC).

- 1. Publicly available information is posted on the AAPC Knowledge Center forum regarding that code.
- 2. The coding specialists search key words that align with the HRSN service (i.e., food, rent, air conditioners) to determine which codes align well with the HRSN service.
- The coding specialists then assess the HCPCS code description and compare it with the HRSN service to make a recommendation. They also consider how the code references or does not reference a unit (15 minutes, per day, per month, etc.)
- 4. The procedure code is then selected by the State.

#### **HRSN Billing Codes and Modifiers**

For all HRSN services, the U1 modifier will be used to indicate that a service is specific to the HRSN program. The use of this modifier will help OHA analyze data specific to HRSN and will help inform future decisions around this benefit.

When filling out claims, HRSN service providers will include the procedure code, the U1 HRSN program modifier, and <u>any additional modifier</u> indicated on the fee schedule for each service rendered.

The following section lays out different scenarios for how HRSN rent and utilities may be billed. Please refer to the fee schedule for the most appropriate code and modifiers.

# **Billing Code Scenarios**

#### General Guidelines:

- To receive HRSN utilities (including forward utilities, arrears, and set up fees). a Member must be receiving HRSN rent.
- Payment may be for past due rent up to six (6) months, or future rent for up to six (6) months, or some combination of past due and future rent not to exceed a total of six (6) months.
- A member must be receiving forward rent in order to also receive forward utilities within the same month. Forward utilities cannot exceed forward rent. but forward rent can be authorized without utilities. In other words, forward (recurring) rent and utilities payments should have the same duration, or utilities should have a shorter duration.
- Scenarios where the utilities have a shorter duration than 6 months include 1) rental arrears were paid; or 2) utilities support is not needed.
- In the case that the rent payment includes utilities (in other words, utilities are not provided as a separate line item on the lease or rent bill), consider this payment as rent only.
- Claims submitted that are above the UPL will only pay up to the UPL amount.

#### Rent and Utilities: Multi-month utility bill

Rent and Utility Pricing — Provision of payment to cover a member's costs for recurring rent and/or short-term, temporary stays, including utilities

Procedure Code	Modifiers	Unit	Housing Unit	Region A <sup>1</sup>	Region B	Region C	Region D	Region E
H004: Supported housing, per month	program	Per month	0–1 bedroom	\$1,780	\$1,390	\$1,125	\$960	\$795
			2 bedrooms	\$2,025	\$1,825	\$1,400	\$1,175	\$980
			3+ bedrooms	\$2,810	\$2,570	\$1,970	\$1,655	\$1,380

Rates listed as 'Actual Costs, subject to maximum allowable', there is an upper payment limit (UPL) of 150% of the OHA expected unit costs.

A. Clackamas, Columbia, Multnomah, Washington, and Yamhill

B. Hood River, Wasco, Benton, and Deschutes

C. Marion, Polk, Lane, Clatsop, Jackson, Linn, Lincoln, and Josephine D. Curry, Tillamook, Crook, Gilliam, Coos, Douglas, Sherman, Jefferson, Union, Umatilla, and Klamath

E. Lake, Wallowa, Malheur, Grant, Baker, Morrow, Wheeler, and Harney

# Example Scenario One: HRSN Rent and Utilities cost is within the allowable monthly UPL

- Alex is renting a one-bedroom apartment in Clackamas County with the water and trash billed quarterly (region A). Alex is eligible to receive rent and utilities assistance for up to six months.
- The UPL is \$2,670 per month (\$1,780 x 150%)
- Alex's rent is \$1,780 each month; water and trash utilities expenses are \$300 each quarter.
- Alex needs support for six months; monthly costs range from \$1,780 to \$2,080, depending on when water and trash payments are due.
- To bill, utilize bill code H0044 and modifiers U1 (HRSN waiver program) and U2 (0-1 bedroom). When the quarterly utility bill arrives, submit a claim for each month's utility service. If needed, calculate the amount to be billed for each month during the service period. For this example, \$300/3 = \$100 per claim.
  - Submit the claim using the date of service per the guidelines in the table below.
  - For a multi-month bill, estimate the days if not provided. For example,
     April 7<sup>th</sup>, May 7<sup>th</sup>, and June 7<sup>th</sup> for a bill covering April 7-July 6<sup>th</sup>).

# Example Scenario Two: HRSN Rent and Utilities cost 'exceeds' the allowable monthly UPL (due to quarterly utilities)

- Josie is renting a **two-bedroom** apartment in Benton County with the water and trash billed quarterly (region B). Josie is eligible to receive rent and utilities assistance for up to six months.
- The UPL for this service is \$2,738 per month (\$1,825 x 150%)
- Josie's rent is \$2,500 each month; water and trash utilities expenses are \$300 each quarter. In this case if the quarterly bill was submitted with a month's rent, it would exceed the UPL. Multi-month bills should be divided into separate claims.
- To bill, utilize bill code H0044 and modifiers U1 (HRSN waiver program) and U3 (2 bedroom). When the quarterly utility bill arrives, submit a claim for each month's utility service. If needed, calculate the amount to be billed for each month during the service period. For this example, \$300/3 = \$100 per claim.
  - Submit the claim using the date of service per the guidelines in the table below.
  - For a multi-month bill, estimate the days if not provided. For example, April 7<sup>th</sup>, May 7<sup>th</sup>, and June 7<sup>th</sup> for a bill covering April 7-July 6<sup>th</sup>).

#### NOTES:

- Any claims submitted that are above the UPL will only pay up to the UPL.
- In the case that a member's rent is above the UPL for HRSN Rent Assistance, it is allowable for the Member to contribute the difference.

The following table provides an example of how claims could be submitted for this scenario.

Month	Claim Amount	Code	
1 (February rent)	\$1,780	H0044, U1 and U2	
1 (February utilities)	\$100 (\$300/3)	T2035, U1 and U2	
2 (March rent)	\$1,780	H0044, U1 and U2	
2 (March utilities	\$100 (\$300/3)	T2035, U1 and U2	
3 (April rent)	\$1,780	H0044, U1 and U2	
3 (April utilities)	\$100 (\$300/3)	T2035, U1 and U2	
4 (May rent)	\$1,780	H0044, U1 and U2	
4 (May utilities)	\$100 (\$300/3)	T2035, U1 and U2	
5 (June rent)	\$1,780	H0044, U1 and U2	
5 (June utilities)	\$100 (\$300/3)	T2035, U1 and U2	
6 (July rent)	\$1,780	H0044, U1 and U2	
6 (July utilities)	\$100 (\$300/3)	T2035, U1 and U2	

#### **Rent and Utilities: Other Funding Support**

Members receiving HRSN rent assistance may receive support for a portion of rent through other programs. HRSN Housing Services may be braided or sequenced with funding from other local, state, and federal programs. However, a member may not receive duplicative services (i.e., receive the same service at the same time). If a member is receiving a similar service with differences in amount or duration, then they can receive HRSN Services, subject to the non-HRSN program's requirements. For example, Members who are receiving voucher support from another program that covers a portion of their rent may be able to receive HRSN Rent and Utility Costs, subject to the voucher requirements, as this service complements but does not duplicate voucher assistance. Before authorizing HRSN Rent and Utility Costs for a member who is already receiving some assistance through another program, the CCO and HRSN Service Providers should confirm it is allowable for the member to

receive additional support through HRSN to supplement any deficiencies in existing program support.

Rent and Utility Pricing: Fee Schedule

# Example Scenario One: HRSN rent and utilities assistance after eviction prevention funding from another program

- Debbie is renting a **three-bedroom** apartment in Deschutes County, utilities included (region B). Debbie receives an eviction notice.
- The UPL is \$3,855.00 per month (\$2,570 x 150%).
- The county provides eviction prevention support to Debbie while she applies for HRSN rent assistance.
- Debbie's rent is \$2,500 each month; eviction support from the county covered the past due rent and utilities arrears; however, Debbie still needs assistance with her ongoing rent and utilities. HRSN may then pay Debbie's rent for up to six months, as needed.
- Her CCO determines she is eligible for HRSN Rent and Utilities Support. The CCO authorizes and will pay Debbie's forward rent and utilities for up to six months. The support Debbie received from the county does not count toward the six months of HRSN Rent and Utilities Support.
- To bill, utilize bill code H0044 and modifiers U1 (HRSN waiver program) and
   U4 (3+ bedroom). Enter the total amount for month of claim(s).

# Example Scenario Two: HRSN rent and utilities assistance to supplement gaps in existing program support

- Jacob is renting a **studio** apartment in Benton County (region B) where the rent is \$1,200 a month, with no additional responsibility for utilities.
- The UPL is \$2,085 per month (\$1,390 x 150%).
- Jacob recently completed a court mandated residential Substance Use
   Disorder treatment program, and his move-in costs were supported through a Measure 110 grant.
- The M110 grant will provide a total of three months of gradually reduced rent assistance consisting of 100% assistance the first month, 80% the second month, and 60% the third.
- As a probation requirement Jacob must continue to participate in intensive outpatient treatment for the next six months, limiting his availability to become stably employed during that time.
- Jacob is aware that he does not have support to maintain his housing without additional assistance beginning in month two of his M110 funding.

- Jacob's CCO determines he is eligible for HRSN Rent and Utilities Support for up to six months, concurrent with his M110 funding.
- Jacob's M110 rental assistance impacts the level of rent support he is eligible to receive through HRSN for the first two months of his eligibility.
- To fill in the gaps in Jacob's M110 assistance the CCO authorizes and will pay 20% (\$240) of Jacob's rent during the first month of his HRSN eligibility, 40% (\$480) of his rent during his second month of HRSN eligibility, and 100% (\$1,200) of his rent during each of months three, four, five, and six.
- To bill, utilize bill code H0044 and modifiers U1 (HRSN waiver program) and U2 (0–1 bedroom)

#### **Rent and Utilities: Separate Utility Bills**

If rent and utilities are billed separately to different entities, the rent and utilities can be included in one claim or separated into two claims. However, the claims, either combined or separated, must not exceed the Max UPL for that month. See the date of service section on pages 11 - 15 for additional details.

Rent and Utility Pricing: Fee Schedule

#### **Example Scenario:**

- Jim is renting a **one-bedroom** apartment in Washington County, but utilities are not included in rent and are paid separately.
- The upper payment limit (UPL) is \$2,670.00 per month.
- Jims's rent is \$1,500 each month, utilities are \$150 each month.
- To bill, utilize bill code H0044 and modifiers U1 and U2.
  - Enter total amount for month of claim.
  - The monthly claim will be one claim of \$1650, or two claims of \$1,500 and \$150; either way the Rent and Utility amounts do not exceed
     Maximum UPL and will be paid in full.

#### **Rent and Utilities: Arrears**

Members may receive support for rent and utilities arrears. While HRSN Housing supports began on November 1<sup>st</sup>, 2024, OHA is allowing rent and utility arrears to be processed for up to six months before that date (no earlier than May 1, 2024) subject to the Member's eligibility and the 6 months' rent and utilities maximum. Please see the date of service table below for additional billing details.

Rent and Utility Pricing: Fee Schedule

#### **Example Scenario:**

- Katrina is renting a **three-bedroom** apartment in Gilliam County and owes her landlord three months' rent for June, July, and August.
- Katrina's rent is \$1,600 each month, which includes utilities.
- Katrina has qualified to receive three months' of HRSN rent arrears and will also need the next three months of rent payments covered through HRSN services. Katrina's CCO will begin paying future rent starting September 14.
- To bill, utilize bill code H0044 and modifiers U1 and U4 and submit separate claims for each month of rent.
  - For the arrears, the August rent will be entered with date of service (DOS) as August 2, July rent with DOS July 2, and June rent with DOS as June 2. (The second date of the month for this date of service was intentional to help OHA track rent arrears).
  - For future rent, enter total amount for month of claim with DOS as September 14.
  - The monthly claim will be one claim of \$1,600, the Rent and Utility does not exceed Maximum UPL and will be paid in full.
  - Katrina may receive rent for October and November. Katrina may not receive HRSN rent payments for December as she will have met the six-month limit for this service.

# Dates of Service for HRSN Services

# **General Guidance for Dates of Service on Encounter Claims**

Wherever possible and available, use the following guidelines to submit date(s) of service according to the type of HRSN service delivered:

#### **Outreach and Engagement**

- For outreach and engagement services:
  - Use the date of service the organization actively interacted with the member.
  - Do not submit a range of dates within one claim unless they are consecutive dates.

#### Climate

- For climate devices: Use the date the device was delivered to the member. If
  possible, use the date the member confirmed as the date device was
  delivered. Alternatively, use either the date the device was ordered or the
  estimated delivery date.
- For climate device installation: Use the date of installation.

#### Housing

- For <u>forward</u> rent assistance (i.e., rent assistance that is paid at the beginning of the month for the month ahead): use the **first** day of the month that the rent is for. Alternatively, if rent is required to be paid prior to the first of the month, use a date within the last seven (7) days of the preceding month (e.g., rent is due February 1; DOS can be February 1 or any day January 25 January 31.
  - For utilities that are <u>not</u> bundled with forward rent: Use the **first** day within the service period. Separate utilities should be submitted on their own claims with their unique dates of service.
- For rent arrears (i.e., rent assistance paid for months in the past): Use the second day of the month that the rent is for. For scenarios where the member was not enrolled in OHP during the time the arrears were accrued, please see the table on page 15 for additional date of service guidance.
  - This allows OHA to distinguish between rent arrears and forward rent payments
- For utilities arrears: Use the **first** day within the service period. This includes the **first** day of the month, if applicable, using the utilities procedure code. For

scenarios where the member was not enrolled in OHP during the time the arrears were accrued, please see the table on page 15 for additional date of service guidance.

#### **Nutrition**

- For Medically Tailored Meals, subsequent days can be submitted on the same claim, such as Monday the 1<sup>st –</sup> Friday the 5<sup>th</sup>. No gaps can exist when billed in a group, such as two weeks on a claim from Monday Friday but omitting the Saturday and Sunday in between.
- The date of service can be billed based on order date or date of receipt.

#### **Dates of Service Scenarios for Housing Services**

The table below outlines dates of service scenarios for members who were enrolled in OHP and enrolled with their current health plan during the time they accrued eligible HRSN housing costs. Please see the scenarios for examples on how to determine DOS.

Member is receiving HRSN and was enrolled in OHP with their current health plan during the time they accrued eligible HRSN housing costs	Guidance on DOS	Example of DOS for Encounter Claim
Forward rent assistance (utilities may or may not be included in rent payment)	Month: Month that the <b>rent is for</b> Day: <b>First</b> day of the month, or any day within the last seven days of the prior month.	Rent is for December 2024  DOS is <b>12/1/24</b> on encounter claim, or any day within 11/24 – 11/30.
Forward utility assistance that is <b>not</b> bundled with rent payment	Month: <b>First</b> month within utilities service period  Day: <b>First</b> day within utilities service period	Utilities Bill is for 12/15/24 – 1/14/25 DOS is <b>12/15/24</b> on encounter claim
Forward utility assistance that is <b>not</b> bundled with rent payment, and is billed quarterly (or for multiple months)	Month: <b>First</b> month within utilities service period  Day: <b>First</b> day within utilities service period	Utilities Bill is for 12/15/24 – 3/14/25  DOS are 12/15/24, 1/15/25, and 2/15/25  The billed amounts are to be split into separate claims, one for each month that utilities were billed in the service period. If separate monthly amounts are unknown, calculate by using total cost divided by number of months. If unknown, calculate DOS by estimating the first date of the service period for each month in the quarter. Each DOS should reflect a different month and should be the same day of the month, if possible.

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		If Utilities Bill is for 12/1/24-12/31/24, it is okay to have that claim with a DOS of 12/1/24 even if there is a Rent Claim with the same DOS. The two will have different billed amounts and each should trigger a payment.
Rent arrears assistance (utilities may or may not be included in rent	Month: Month that the <b>rent arrears is for</b>	Rent arrears for October 2024.
payment)	Day: <b>Second</b> day of the month	DOS is <b>10/02/24</b> on encounter claim.
	Month: <b>First</b> month within utilities service period	
Utilities arrears assistance that is <b>not</b> bundled with rent payment	Day: <b>First</b> day within utilities service period	Utilities Bill is for 10/13/24 – 11/12/24
	<b>Note</b> : For utilities arrears, DOS can be on the first day of month, if applicable, because utilities arrears has its own procedure code.	DOS is <b>10/13/24</b> on encounter claim.
	Month: <b>First</b> month within utilities service period	Utilities Bill is for 8/04/24 – 11/03/24
Utilities arrears for multiple months	Day: <b>First</b> day within utilities service period	DOS are <b>8/04/24</b> , <b>9/04/24</b> , and <b>10/04/24</b> Calculate monthly amount using total cost
that is <b>not</b> bundled with rent payment	poriod	divided by number of months. Calculate DOS by estimating the first date of the service period for each month in the quarter. Each DOS should reflect a different month.

The following table outlines dates of services for members who were not enrolled in OHP and/or not enrolled with their current health plan during the time they accrued any eligible HRSN housing costs. Please see the scenarios for examples on how to determine DOS.

Member is receiving HRSN and was not enrolled in OHP and/or not enrolled with their current health plan during the time they accrued and eligible HRSN housing costs.		Example of DOS for Encounter Claim		
Rent arrears assistance (utilities may or may not be included in rent payment)	month, and OHP enrollment effective date. If multiple arrears months, order DOS from most recent month to least recent month.	Member has rent arrears for September, October, and November 2024; Member enrolled in OHP/health plan November 11, 2024.  DOS for rent accrued in November: 11/11/24  DOS for rent accrued in October: 11/12/24  DOS for rent accrued in September: 11/13/24		
Utilities arrears assistance that is <b>not</b> bundled with rent payment	Day: First day OHP enrollment effective date and closest day that falls after the first day of the utilities billing period. If	Member is eligible for HRSN in Nov, needs utilities arrears for Sept/Oct DOS for utilities accrued in Oct: Nov. 1 DOS for utilities accrued in Sept: Nov. 2, etc.		

#### **HRSN Technical Submission Tip Sheet**

#### Information on EDI loops, segments, and required claim elements:

Plan ID# - must be Plan member is enrolled in on date of service

Billing Provider ID# (must be CCO OR HRSN Provider Type)

- If Typical 2010AA using NPI
- If Atypical 2010BB, REF01 with G2 qualifier

Rendering Provider ID# (sent only if different than Billing Provider in Loop 2010)

- If Typical 2310B using NPI (NM108/NM109)
- If Atypical 2310B using Medicaid ID# (REF01/G2 Qualifier)

Diagnosis Code – must contain a valid diagnosis code – Loop 2300

CCO Paid Amount - Loop 2320 AMT

Detail Line including HRSN Procedure Code and Modifier, Date of Service, HCP and Allowed Amount – Loop 2400

Claim Adjustment Segment - Loop 2430 CAS

# **Additional Billing Guidance**

#### **Nutrition**

Nutrition Pricing: Fee Schedule

When applicable certain services, such as Medically Tailored Meals Assessment, should be billed to Medicaid before HRSN if eligible.

- Traditional Medicaid providers do need to enroll as HRSN providers in order to provide and bill for HRSN services.
- No more than three meals/day, 21 meals/ week, or 93 meals/month may be billed
- Services can be billed on a daily, weekly, or monthly basis. Units not to exceed 3/day, 21/week, 93/ month. Billing can be based on order date or date of receipt.

#### **Utilities Arrears and Utilities Set-Up**

Utility Pricing: Fee Schedule

- Utilities Arrears and Utilities Set Up covers standard utilities, including electricity, gas, water/sewer, and garbage, as well as phone and internet.
- Utilities Arrears does not have additional modifiers beyond the U1 modifier required for all HRSN services. It utilizes the same procedure code as Utilities Set up but does not require the bedroom size modifiers in order to differentiate between the two services. Even though a second modifier is not used when billing for Utilities Arrears, the CCO is responsible for ensuring the payment adheres to the upper payment limit for the region and number of bedrooms.

#### **CCO Variable Admin**

HRSN Service Providers should not use the Procedure code 99499 to cover administrative costs associated with providing housing services on claims to CCO. The CCO Variable Admin code 99499 is only billable by CCOs. Housing Supports CCO Variable Admin is payable associated with claims for each of the following: 1) the first month of rent and utility costs per member (H0044), 2) the first instance of medically necessary home accessibility modifications per member (S5165-U1-UB), and 3) the first instance of medically necessary home remediations per member (S5165-U1-U9). Climate-Related Supports CCO Variable Admin can be claimed once per eligible device, per member, per 36 months.

**NOTE:** If a claim that substantiated a CCO Variable Admin claim was ultimately voided, the admin claim must also be voided by the CCO. Variable administrative fees are only valid for clean claims and must also be voided when the claim that qualifies this payment is voided.

**NOTE**: CCOs receive HRSN-related administrative payments via fixed, PMPM payments as part of monthly capitation rates, as well as variable administrative payments for select HRSN services. Together, the fixed and variable payments generally compensate CCOs for a reasonable level of administrative costs to meet the CCO's responsibilities.

The variable admin listed on the fee schedule is not for providers to include on claims to CCOs. HRSN Service Providers can bill for their time working on a member's behalf through HRSN Outreach and Engagement and Housing Tenancy Services. The costs of providing these services should be covered by the fee schedule rates. If HRSN Service Providers have concerns with the adequacy of these rates, OHA asks that CCOs help pass that feedback along, detailing their concerns.

- Outreach and Engagement: Providers should provide this service and use this procedure code (T1017) when working with or on behalf of an OHP member that is presumed eligible for HRSN Outreach and Engagement Services. Presumed eligible means the member told the provider, or the provider knows from experience with the member, that the member is in an HRSN Covered Population, has a qualifying health condition (clinical risk factor), and needs HRSN Outreach and Engagement Services to improve their health and wellbeing. HRSN Outreach and Engagement can be billed when supporting a member with other HRSN or non-HRSN services.
  - For the use of Outreach and Engagement services for homeowners, please refer to guidance document 4(a)iii. Home Modifications and Remediations which provides insight on this. There is not a distinction between homeowners and renters for O&E.
- Tenancy Services: Providers should provide this service and use this procedure code (H2015) when supporting individuals or households, or both individuals and households, to achieve their stability goals. This service can only be used to

support Housing services only, and must be authorized with HRSN rent and utilities, or as a standalone service for an eligible member.

# **Frequently Asked Questions**

#### **Fee Schedule**

1. What does Upper Payment Limit (UPL) mean?

The UPL is provided to allow for adjustments in costs across geographies and member need. The expected unit cost listed on the fee schedule is the amount that the State expects most claims to exhibit. The UPL allows payments to be made for services up to 150% of the expected costs. All services will be paid in accordance with the actual cost of the service. If the costs of the service, as demonstrated in receipts/invoices, is less than the expected unit cost, the service will be reimbursed at the lower amount.

2. Why aren't administrative rates built into the fee schedule for HRSN Service Providers?

Administrative load is embedded in the fee schedule rates for outreach and engagement and tenancy services. See page 18 for additional information.

#### **General Billing**

3. Is there is any specific documentation required by the provider at the time of submitting an invoice/bill?

HRSN service providers must maintain appropriate documentation before invoicing for services. No specific documentation is required to bill OHA for services, but providers should work with their CCO to ensure that the documentation is maintained for audit purposes.

4. If a Member has OHP when the HRSN service is authorized but is no longer eligible once billing occurs, will the HRSN providers be reimbursed?

Yes, if a member was eligible for the service and enrolled in OHP at the time of service delivery, OHA will still pay the claim. OHA will not be able to pay for claims where a member's eligibility does not overlap with the dates(s) of service delivery. For example, a member losing their OHP enrollment after their third month of rent when they were initially authorized for six. In such cases, CCOs may explore covering services through HRS, Flex Funds, or other local, state, and federal programs.

#### **Billing 15-Minute Increments**

- 5. Billing Medicaid using time-based codes typically carries strict tracking and documentation requirements. What documentation is needed from vendors to ensure compliance?
  - For installation of climate devices (S5165), there needs to be proof that the
    installation occurred, details on the member connected to the device being
    installed, and the amount of time to install the device. This could be a receipt
    detailing the service provided, date installed, and time to install, which also
    notes the member name/Medicaid identification with the member's signature.
    Providers should work with the member's CCO to confirm the type of
    documentation required.
  - For Tenancy Support Services (H2015), there needs to be documentation of the member ID, date of service, duration (units), and a brief description of services provided. Refer to the CCO HRSN Guidance document section 4e for more details.
  - For Assessment of Medically Tailored Meals (97802), there needs to be documentation of the member ID, date of service, duration (units), and a brief description of services provided.
  - For Reassessment for Medically Tailored Meals (97803), there needs to be documentation of the member ID, date of service, duration (units), and a brief description of services provided.
  - For Nutrition Education (98961), there needs to be documentation of the member ID, date of service, duration (units), and a brief description of services provided (including 1:1 or group).
  - For Outreach and Engagement (T1017), there needs to be documentation of the member ID, date of service, duration (units), a brief description of services provided, and outcome of the O&E visit. Refer to the CCO HRSN Guidance document section 2e for more details.
- 6. When billing in 15-minute units, does the eight-minute rule apply? For example, if a vendor spends eight minutes or less of a 15-minute increment, the unit cannot be billed.

Yes, the eight-minute rule applies. The provider may bill for one 15-minute unit if the duration of the service is eight minutes or more of a 15-minute increment. For example, one unit if the service is between 8 minutes and 22 minutes, two units of the service is between 23 minutes and 37 minutes, etc.

#### Housing

#### 7. Is the intent for rent and utilities to always be paid together?

Utilities and rent have been combined on the fee schedule to align with Fair Market Rent (FMR). FMR is a gross rent estimate that includes the utility allowance. Rather than develop separate utilities and rent limits, there is a single, UPL for the combined cost. This UPL is considered reasonable and appropriate to cover the cost for rent and covered utilities.

The fee schedule was built to accommodate rent and utilities to be bundled together, but OHA understands it may also be paid separately. Please note, the total payment(s) for a members rent and utilities combined must be under the total upper paid limit and meet durational limits as specified in rule.

- 8. Can CCOs pay for prepaid utilities? How are prepaid utilities handled? Yes. OHA will defer to CCOs to determine their processes and appropriate amount to prepay for prepaid utilities.
- Are storage arrears included in Storage Unit Support?
   No. storage unit arrears are not covered under this benefit.

#### 10. Can CCOs pay for arrears if they have been sent to collections?

No, once sent to collections arrears are no longer eligible for HRSN.

### 11. How are landlords to manage telephone and internet, which are included in utilities for HRSN?

It is not expected that landlords include telephone and internet within the rent payment. However, these are covered utilities under HRSN. These utilities will be paid to a vendor other than the landlord. The monthly claim(s) should reflect the total cost of rent and utilities for that month.

## 12. If each utility can be covered for up to six months, how does it work when it is included in a member's rent?

Members can have coverage for utilities up to six months, combining utilities arrears, utilities set-up, and monthly utilities. Utilities that are included in a member's rent still count toward the six months of coverage, regardless of if any unbundled utilities are also being paid. For example, if a member receives two months of utilities arrears in a prior housing unit and one month of utilities set-up for a new housing unit, the member is only eligible for three months of additional

monthly utilities coverage. Please review the Billing Scenarios, starting on page 5 that provide additional examples.

13. How is prorated rent to be handled? If the first payment is made on the last day of the month or part way through the month, does it count in the sixmonth limit?

Monthly rent can be billed at any point of the month and will count towards the sixmonth rent limit. Rent that is only for a partial month, to be followed by monthly rent billing, can be billed per day until the monthly billing date begins. Per day units will be tallied, with 30 days counting as 30 units representing one month, and counted in the six-month limit. The monthly bill should be for the day of payment as stated in the dates of service table, not a range.

14. Could there be a situation where the date of service (DOS) overlap? For example, could rent have DOS for November 2nd and utilities have DOS for November 2nd?

Yes, a rent claim and a utilities claim can both share a date of service even though they share a procedure code. The two claims, submitted separately, can process even if they share a date of service. Please refer to the table of scenarios on pages 11 – 15 for information on how to handle dates of service. If your scenario is not addressed in the table, please reach out to Mary Durrant mailto:Mary.DURRANT@oha.oregon.gov and Jessi Wilson jessica.l.wilson@oha.oregon.gov for additional guidance.

#### **Climate**

15. Is there guidance regarding the time installation vendors can claim? (e.g. can they bill for transportation time or just the time doing the installation?)

HRSN Service Providers/Vendors can bill for total time to complete installation, including drive time. The maximum billed amount is eight units, or two hours.

16. Given the time-based reimbursement structure, it seems that installation vendors who charges a flat rate do not qualify. Can you confirm this?

Yes, that is correct. If this poses a significant barrier to service delivery/access, please contact the member's CCO or OHA to detail the concerns.